

that the patent differs from the instant claimed structure by the use of different shapes and arrangements.

Applicants traverse this ground of rejection since the reference is directed to an ion exchange membrane electrolyzer as can be seen from claim 1 while the present invention is directed to a cathodic finger structure for a diaphragm electrolytic cell which is entirely different technology as is well known to any one skilled in the art. It is clearly stated at the beginning of column 1 of the Iacopetti et al patent. "Today chlorine and caustic soda are industrially produced in plants based on the mercury cathode, diaphragm or ion-exchange membrane technologies. While the first two technologies are considered fully developed and only marginal improvements may be foreseen, the third one, much more recent, is the only one used in, grass-roots plants and is under continuous evolution."

It is therefore not true as the Examiner has stated that "the patent differs from the instant claimed structure by the use of different shapes and arrangements". The fact that the two technologies are entirely different has the important consequence that the elements that the Examiner recognized as equivalent are in totally different relationships. The present invention is directed to improving a finger structure, which is a particular type of porous cathode having a diaphragm deposited on its surface. A more detailed description of a cathodic finger structure is given for instance, on page 3 and in the paragraph bridging pages 3 and 4 of the present specification. Iacopetti et al. discloses no finger structure whatsoever, because membrane cells have cathodes of totally different shape, consisting of a planar superposition of planar screens or meshes (see for instance

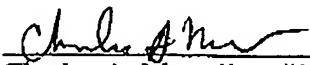
figure 1, figure 7 and the corresponding description at col. 5, rows 54 and ff. Cathodes of membrane cells such as the one disclosed in Iacopetti et al. are not hollow bodies and they define no internal volume that could be fit with a reinforcing and current-distributing internal element.

The cited passage at col. 4 line 24 to col. 5, line 53 refers to the electrolyser cell chambers as a whole and not to the structure of the cathode, which is just one element inside one of the two chambers and which, in the specific case of Iacopetti et al., consists of superposed planar metal screens.

There is no element in Iacopetti et al. that anticipates or renders obvious the present invention, and Applicants respectfully request withdrawal of this ground of rejection.

In view of the above remarks, it is believed that the claims point out Applicants' patentable contribution. Therefore, favorable reconsideration of the application is requested.

Respectfully submitted,


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Enclosures

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